



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 22, 2015

CHARLES R. SPIES, TREASURER
RIGHT TO RISE USA
6230 WILSHIRE BLVD. PMB 1790
LOS ANGELES, CA 90048-5126

Response Due Date

10/27/2015

IDENTIFICATION NUMBER: C00571372

REFERENCE: AMENDED MID-YEAR REPORT (01/01/2015 - 06/30/2015), RECEIVED
08/07/2015

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 item(s):

1. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the the following description(s): "IN-KIND: DONOR MEMENTOS." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf.

2. Your committee has filed a 48 hour report for an independent expenditure supporting "Jeb Bush" (see attached) which has not been itemized on Schedule E supporting Line 24 of the Detailed Summary Page. Please be advised that independent expenditures disclosed on 48 hour reports must also be itemized on a corresponding Schedule E or MEMO Schedule E and Schedule D (if applicable), in the appropriate reporting period. Further, if the actual payment(s) for the independent expenditure(s) occurs after the date of dissemination, the appropriate report(s) should continue to show payment on Schedule E and Schedule D, until the debt is fully extinguished. Please amend

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Page 2 of 3

your report and any subsequent reports that may be affected by this correction.
(11 CFR §104.4)

3. Schedule E of your report indicates that your committee may have failed to timely file one or more of the required 48 hour report(s) for independent expenditures (see attached). A political committee must file a 48 hour report with the Federal Election Commission as specified in 11 CFR §104.4(b), within 48 hours of any independent expenditures aggregating \$10,000 or more with respect to a given election, made any time during the calendar year up to and including the 20th day before an election. The report must be received by the Commission by 11:59 p.m. on the second day following the date on which independent expenditures that aggregate \$10,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration.
(11 CFR §104.3(b))

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1143.

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Page 3 of 3

Sincerely,

A handwritten signature in black ink that reads "Kaitlin E. Seufert". The script is cursive and fluid, with the first name "Kaitlin" being more prominent than the last name "Seufert".

Kaitlin Seufert
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

315

Missing Schedule E (48 Hour Report)
RIGHT TO RISE USA (C00571372)

Name of Payee	Dissemination Date	Amount	Candidate	Election
Revolution Media Group	6/26/15	\$8,000.00	Jeb Bush	P2016
Revolution Media Group	6/26/15	\$12,000.00	Jeb Bush	P2016

Late 48 Hour Report (Schedule E)
RIGHT TO RISE USA (C00571372)

Name of Payee	Dissemination Date	Amount	Candidate	Election	Report Received
REVOLUTION MEDIA GROUP	6/24/15	\$32,000.00	JEB BUSH	P2016	7/31/15
REVOLUTION MEDIA GROUP	6/24/15	\$8,000.00	JEB BUSH	P2016	7/31/15
Revolution Media Group	6/26/15	\$8,000.00	Jeb Bush	P2016	7/31/15
Revolution Media Group	6/26/15	\$12,000.00	Jeb Bush	P2016	7/31/15